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25 UNITED STATES DISTRICT COURT  
26 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
27 SAN FRANCISCO DIVISION

28 AMERICAN FEDERATION OF  
GOVERNMENT EMPLOYEES, AFL-CIO,  
et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity  
as President of the United States, et al.,

Defendants.

Case No. 3:25-cv-03698-SI

**DECLARATION OF MICHAEL PAUL  
BLACK IN SUPPORT OF PLAINTIFFS'  
MOTION FOR PRELIMINARY  
INJUNCTION**

**DECLARATION OF MICHAEL PAUL BLACK**

I, Michael Paul Black, declare as follows:

1. I am over 18 years of age and competent to give this declaration. This declaration is based on my personal knowledge, information, and belief. I am providing this declaration in my capacity as a union president.

2. I am the president of the Peace Corps Employees Union, Local 3548, District Council 20, American Federation of State, County and Municipal Employees, AFL-CIO ("AFSCME Local 3548" or "Union"). AFSCME Local 3548 represents a collective bargaining unit of approximately 328 employees of the Peace Corps. I have served as president of Local 3548 since September 2024, but I have been involved with the union as a member and officer in several roles since 2020. AFSCME Local 3548 is affiliated with AFSCME District Council 20 and AFSCME International Union.

3. The Peace Corps (or "Agency") is an independent agency of the U.S. government established under 22 U.S.C. 2501 that trains and deploys volunteers to communities in partner countries around the world. The Peace Corps' mission is to promote world peace and friendship. This is achieved through volunteers working in various sectors like education, health, economic and community development, living and working alongside local communities in partner countries. The Peace Corps assists developing countries by providing skilled workers in fields such as education, health, entrepreneurship, women's empowerment, and economic and community development.

4. Bargaining unit members serve and support Peace Corps Volunteers ("Volunteers"). Currently, the Peace Corps has approximately 3500 Volunteers in the field in approximately 61 host countries. Volunteers are U.S. citizens, typically with a college degree, who are assigned to specific projects in certain countries based on their qualifications and experience. Volunteers typically serve a term of 2 years in a host country. Many Peace Corps employees were once Peace Corps Volunteers.

5. Both before and since becoming the local union president, I have been employed by Peace Corps, and I am currently serving as a Sr. Recruiter for the Peace Corps in Boston, Massachusetts. I have been employed at Peace Corps since December 2019. Prior to joining the

1 Peace Corps as a federal employee, I was serving abroad in Albania as a Peace Corps volunteer in  
2 a community economic development role. In my current position I help manage Peace Corps  
3 recruiting efforts in the greater Boston area in Massachusetts.

4 6. The AFSCME Local 3548 collective bargaining agreement covering these workers  
5 is applicable, by its terms, to “all Peace Corps nonprofessional employees nationwide including  
6 part-time and intermittent employees.”

7 7. Bargaining unit members work and live all over the country servicing different  
8 regions as field-based recruiters or who are remote workers on remote work agreements, including  
9 in California, and many members work at the Peace Corps headquarter offices in Washington,  
10 D.C. Unlike Peace Corps Volunteers who are based abroad, Local 3548 bargaining unit members  
11 are U.S. based.

12 8. Bargaining unit members span the breadth of the agency and work in accounting,  
13 IT, operations and finance departments among other Peace Corps departments. Bargaining unit  
14 members also work in positions that support the mission of the Peace Corps to recruit and place  
15 Volunteers to serve abroad in a Peace Corp host country, provide support to Volunteers once  
16 deployed to a host country, and support host country Peace Corps staff and programs. These  
17 employees include recruiters who are the first point of contact for potential Volunteers and who  
18 identify qualified candidates, placement staff who interview qualified candidates and make  
19 decisions on who will be invited to participate in the program, host country desk staff who are the  
20 liaison between host country staff and incoming Volunteers, training staff who train Volunteers,  
21 and health staff who make sure Volunteers are medically cleared to deploy to a host country.

22 9. The vast majority of Peace Corps employees receive time-limited appointments and  
23 most employees are limited to a maximum of five years of employment with the agency. This time  
24 limit is referred to as the “five-year rule.” It was established to ensure that Peace Corps staff, like  
25 Volunteers, bring fresh ideas and innovation to the agency. In certain circumstances, this term can  
26 be extended by either 12 months and/or 30 months, making the maximum employee term 8 1/2  
27 years. However, certain positions are exempted from these extensions under law.

28

1           10.     AFSCME Local 3548 represents the interests of the Peace Corps employees. Our  
2 core functions include providing support, guidance, and resources to bargaining unit employees as  
3 their officially recognized exclusive representative.

4           11.     Beginning in February 2025, employees of Peace Corps began to receive the  
5 “Deferred Resignation Program” or “fork in the road” emails from OPM, and other pressure to  
6 leave their jobs. First, employees were offered the Deferred Resignation Program via  
7 government-wide email with short deadlines and confusing language. Only 13 bargaining unit  
8 employees accepted the Deferred Resignation Program (“DRP”) offer because it was so confusing  
9 and lacked legitimacy. However, the agency continues to pressure employees to leave their  
10 positions in various new ways.

11           12.     On April 28, 2025, Peace Corps employees were offered a second round of the  
12 Deferred Resignation Program—but this time the offer was made by the agency itself, to all  
13 bargaining unit members. The new DRP again included tight deadlines for a response, pressuring  
14 employees to leave the federal service. A response email applying for the program was required by  
15 May 6, 2025. On May 12, 2025, the employees received an email from the agency indicating that  
16 all employee applications for the second round of the Deferred Resignation Program were  
17 accepted, and employees who applied would receive an agreement to sign memorializing their  
18 participation in the DRP, with a due date to sign the agreement by May 19 or June 26, 2025,  
19 depending on their age. Employees under the age of 40 must sign before May 19 and employees  
20 40 and over have until June 26 to sign. Because of all the uncertainty about continued employment  
21 and the imminent Reduction in Force (“RIF”) at the Peace Corps and my conversations with  
22 members, I expect that a significant number of bargaining unit members applied for the second  
23 round of the Deferred Resignation Program and the bargaining unit will be significantly reduced  
24 even prior to a RIF, unless the employees are allowed to extend the deadline for signature or to  
25 rescind their signature.

26           13.     The Peace Corps has given many indications that it will significantly reduce the  
27 Peace Corps workforce soon through a RIF. As bargaining unit members were being asked to  
28 consider leaving the service voluntarily through the second Deferred Resignation Program, various

1 departments of the Peace Corps held many all-staff meetings to provide their staff with  
2 information about a potential reduction of the Peace Corps staff. Numerous department heads and  
3 HR shared specific information with staff, including that the agency planned to cut 2/3 of certain  
4 department staff and, in some instances, supervisors told employees that their positions would be  
5 cut in a RIF. These statements about forthcoming RIFs were made to pressure employees to  
6 participate in the Deferred Resignation Program. Many headquarter employees have overheard  
7 conversations, been part of meetings, or have seen documents that indicate that the agency is  
8 preparing for a significant RIF, to the point that it is now common knowledge among all agency  
9 employees that significant RIFs are imminent at Peace Corps. It appears clear that a RIF is coming  
10 soon after the agency determines how many employees have chosen to voluntarily resign through  
11 the new Deferred Resignation Program.

12 14. The press has also reported on these “significant restructuring efforts” at the Peace  
13 Corps, including that “Peace Corps may reduce its global staff by 25 percent, potentially closing  
14 some of its 60 international posts” and that the cuts were triggered by “a review by the Department  
15 of Government Efficiency.”<sup>1</sup> The report notes that cuts at the Washington D.C. headquarters are  
16 anticipated to be even more severe – ranging from 50 to 80 percent of headquarter staff. A true  
17 and correct copy of that May 9 article, which can also be found at  
18 [https://www.independent.co.uk/news/world/americas/us-politics/peace-corps-restructuring-doge-](https://www.independent.co.uk/news/world/americas/us-politics/peace-corps-restructuring-doge-review-b2748241.html)  
19 [review-b2748241.html](https://www.independent.co.uk/news/world/americas/us-politics/peace-corps-restructuring-doge-review-b2748241.html), is attached hereto as Exhibit A.

20 15. The Peace Corps’ efforts to significantly reduce the bargaining unit through the  
21 Deferred Resignation Program and an imminent RIF directly threatens the Union’s ability to  
22 provide core services to unit members and to accomplish its mission. Since the Peace Corps has  
23 initiated these efforts, the Union has been inundated with communications from affected  
24 employees who are feeling blindsided by the agency’s actions and are very concerned about their  
25 livelihoods and the mission of the Agency. Affected employees have contacted the union to seek  
26  
27

28 <sup>1</sup> See Independent, *JFK-created Peace Corps prep for ‘significant restructuring efforts’ as DOGE targets humanitarian group* (May 9, 2025).

1 information, guidance, explanations of their rights, and to ask how the union is challenging the  
2 agency's actions.

3 16. The Union's staff and activities are funded through members' voluntary dues, most  
4 of which are paid through payroll deduction. If the Union no longer receives dues from members  
5 that resign due to pressure from the agency or through a RIF, it will be significantly more difficult  
6 for the Union to continue to function and to provide the services and protection to bargaining units  
7 identified here, including current CBA negotiations. The union is already making succession plans  
8 for its executive board, in case we lose officers due to a RIF to make sure the union continues to  
9 function and hold officer elections of remaining members.

10 17. Peace Corps operations will also be negatively affected by a significant reduction  
11 of the bargaining unit due to voluntary resignation under duress and the imminent RIF. Due to the  
12 government-wide hiring freeze implemented by the Trump Administration, the Peace Corps has  
13 been unable to fill approximately 100 bargaining unit positions and is currently operating at  
14 approximately 75% bargaining unit capacity. If the bargaining unit is reduced to the point that  
15 remaining staff cannot serve all the host countries, the Peace Corps will be required to shut down  
16 operations in those host countries, directly impacting the Volunteers who have upended their lives  
17 to serve and further the Peace Corps' mission abroad. Volunteers cannot be supported in the field  
18 without the appropriate staff in place in the U.S. and will have to be evacuated from their posts  
19 and lose benefits as established by law because they will be unable to complete their terms in  
20 order to qualify for those benefits. Further, losing a host country is detrimental to the Peace Corps'  
21 mission, because the agency would lose the institutional knowledge of those partners working  
22 with the Peace Corps in host countries and it would take years to rebuild the relationships and  
23 infrastructure in the host country to be able to host Volunteers in the future.

24 18. The Peace Corps' significant reduction of its workforce will directly impact  
25 Volunteers and, in turn, will make it nearly impossible to recruit new Volunteers in the future,  
26 further endangering the existence of the agency. There are three main benefits that volunteers earn  
27 at the end of their service, which is typically a 2-year term. First, Volunteers earn a cash  
28 readjustment allowance that accrues on a monthly basis and is paid at the end of the term. Second,

1 Volunteers earn non-competitive eligibility for federal hiring provided by law after completing a  
2 full 2-year term. Third, Volunteers earn a Coverdell Fellowship that helps pay for graduate school  
3 after completing their term. If a Volunteer's term is cut short because the Peace Corps does not  
4 have the staff to continue serving Volunteers in host countries, this endangers all of the benefits of  
5 joining the Peace Corps and future recruitment of Volunteers will be difficult, if not impossible.

6 19. It appears to me, based on my years of service at Peace Corps, that this reduction of  
7 the Peace Corps workforce is intended to cripple the agency's ability to fulfill its mission, and  
8 potentially lay the groundwork for the Agency's elimination which was created and authorized by  
9 Congress. The U.S. and the global community are better off for the work that the Peace Corps and  
10 its employees perform every day in supporting Volunteers around the world. My fellow Peace  
11 Corps employees and I have dedicated our lives to the promotion of world peace and friendship  
12 through public service, and the agency's actions to reduce the already limited workforce is  
13 detrimental to the mission and functions of the agency that is established by law.

14 I declare under penalty of perjury under the laws of the United States that the foregoing is  
15 true and correct. Executed May 13, 2025, in Boston, MA.

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18 Michael Paul Black  
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# Exhibit A



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# JFK-created Peace Corps preps for 'significant restructuring efforts' as DOGE targets humanitarian group

The 65-year-old Peace Corps is undergoing "significant restructuring efforts" as the Trump Administration implements its "America First" campaign promise.

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Peace Corps staffers have been warned about "significant restructuring efforts" following a review by the [Department of Government Efficiency](#) as the Trump Administration focuses on bringing American resources back home.



The agency has been given a second opportunity for a government buyout as the **Washington, D.C.**, headquarters, with nearly 800 employees, prepares for departmental cuts ranging from 50 percent to 80 percent, according to an email sent to staffers from chief executive Allison Greene, as reported by *The Guardian*.

Greene referred to the second deferred resignation program as "DRP 2.0," while DOGE leader Elon Musk called it a "fork in the road" buyout. The program was offered to direct hire and expert staff from April 28 to May 6. This option allowed employees to resign or retire while on paid administrative leave until September 30.

The Peace Corps may reduce its global staff by 25 percent, potentially closing some of its 60 international posts, which supporters warn could weaken the agency's core mission of supporting over 3,000 **volunteers**.

Greene's memo said the cuts will only affect Peace Corps staffers, not volunteers.



Elon Musk's Department of Government Efficiency is making significant staffing cuts to the 65-year-old Peace Corps, according to reports. (Getty Images)

"The agency will remain operational and continue to recruit, place, and train volunteers, while continuing to support their health, safety and security, and effective service," a Peace Corps spokesperson told *The Guardian* on April 28, confirming DOGE started the cuts that day.

*The Independent* has connected representatives for the Peace Corps for comment.

Founded by President John F. Kennedy in 1961, the Peace Corps sends volunteers to partner with **communities** in other countries to promote development and foster goodwill with focuses on education, health, and economic development.

With a 2024 fiscal year budget of around \$430 million, the Peace Corps makes up less than a tenth of a percent of the total federal budget.

Trump and Musk have embarked on an aggressive campaign to downsize the federal government, aiming to cut \$2 trillion in spending - but **unlikely to get to that total**. DOGE is central to this initiative, which employs automation tools like the "Workforce Reshaping Tool" to streamline mass layoffs across various agencies. This approach has already resulted in the dismissal or retirement of approximately 260,000 federal employees, with significant reductions in departments such as Veterans Affairs and the IRS.

The Trump Administration has made major staffing cuts to USAID, the Department of Health and Human Services, the Environmental Protection Agency and the Federal Emergency Management Agency. It is also working to abolish the Department of Education.

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